

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

v.

ABDUR RAHIM ISLAM  
SHAHIED DAWAN  
KENYATTA JOHNSON  
DAWN CHAVOUS

No. 2:20-CR-00045-GAM

Honorable: Gerald Austin McHugh

**PROPOSED ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2022, upon consideration of the Joint Motion of Defendants Dawn Chavous and Kenyatta Johnson to Seal their Joint Motion to Unseal the Government's Motion to Restrict Scope of Cross-Examination of Government Witness (ECF No. 137), it is **ORDERED** that the Joint Motion to Seal is **GRANTED**. The Joint Motion to Unseal the Government's Motion to Restrict Scope of Cross-Examination of Government Witness **SHALL BE FILED UNDER SEAL**.

BY THE COURT:

\_\_\_\_\_  
HON. GERALD AUSTIN MCHUGH  
United States District Judge

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**JOINT MOTION TO SEAL JOINT MOTION TO UNSEAL THE GOVERNMENT’S  
MOTION TO RESTRICT SCOPE OF CROSS-EXAMINATION**

Defendants Dawn Chavous and Kenyatta Johnson, by and through undersigned counsel, hereby move to seal the concurrently submitted Joint Motion to Unseal the Government’s Motion to Restrict Scope of Cross-Examination of Government Witness (“Motion to Unseal”), attached hereto as Attachment 1.<sup>1</sup> In support thereof, Ms. Chavous and Councilmember Johnson aver as follows:

1. On January 28, 2020, a federal grand jury returned a 22-count Indictment against Defendants Abdur Rahim Islam, Shahied Dawan, Kenyatta Johnson, and Dawn Chavous. Councilmember Johnson and Ms. Chavous were charged in only two of those counts: Honest Services Wire Fraud in violation of 18 U.S.C. §§ 1343 and 1346. ECF No. 1.

2. Trial is scheduled to commence on March 21, 2022 on Counts 9 and 10. ECF No. 111.

3. On January 4, 2022, the Government filed its Motion to Restrict Scope of Cross-Examination of Government Witness (“Motion to Restrict”). ECF No. 137. The Government concurrently moved to file the Motion to Restrict under seal. ECF No. 136.

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<sup>1</sup> An unredacted version of Attachment 1 has been submitted to the Court via electronic mail.

4. Pursuant to an Order issued by this Court, the Government's Motion to Restrict has been sealed. ECF No. 138.

5. Ms. Chavous and Councilmember Johnson's Joint Motion to Unseal discusses various issues raised in the Government's Motion to Restrict and could therefore reveal matters presently protected from disclosure pursuant to the Court's sealing order.

**WHEREFORE**, Ms. Chavous and Councilmember Johnson respectfully request that the Court enter an Order in the form submitted herewith directing that the Joint Motion to Unseal be filed under seal.

Respectfully submitted,

Dated: January 20, 2022

/s/ Barry Gross

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*Attorneys for Defendant Kenyatta Johnson*

**CERTIFICATE OF SERVICE**

I, Barry Gross, hereby certify that on this day I caused a true and correct copy of the foregoing to be filed electronically with the Case Management/Electronic Case Filing System (“CM/ECF”) for the Federal Judiciary. Notice of this filing will be sent to all parties by operation of the Notice of Electronic Filing system, and the parties to this action may access this filing through CM/ECF.

Dated: January 20, 2022

/s/ Barry Gross

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